

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

MARYLAND SHALL ISSUE, INC., *et al.*, \*

*Plaintiffs,* \*

v. \* No. 1:16-cv-03311-ELH

LAWRENCE HOGAN, *et al.* \*

*Defendants.* \*

\* \* \* \* \*

**DEFENDANTS' MOTION TO STRIKE OPINIONS OF PLAINTIFFS'  
LAY WITNESS MARK PENNAK AND  
EXPERTS GARY KLECK AND CARLISLE MOODY**

Defendants Governor Lawrence J. Hogan, Jr. and Superintendent of Maryland State Police Colonel Woodrow W. Jones, III, both sued in their official capacities, hereby move to strike the opinions of the plaintiffs' lay witness Mark Pennak and experts Gary Kleck and Carlisle Moody, pursuant to Local Rule 105. The grounds for this motion are set forth in the Memorandum of Law filed herewith and incorporated by reference herein.

WHEREFORE, for the reasons stated herein, defendants respectfully request that the Court enter an order striking paragraphs 8-10, 13, 15-17, 18-19 and 21-23 of Mark Pennak's declaration (ECF 135-3) and strike the declarations of Carlisle Moody (ECF 135-24) and Gary A. Kleck (ECF 135-25 and ECF 135-29).

Respectfully Submitted,

BRIAN E. FROSH  
Attorney General

/s/ Robert A. Scott

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Attorneys for Defendants